

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GMA ACCESSORIES, INC.,	:
	:
Plaintiff,	:
	:
- against -	:
	:
HMY JEWELRY, INC.,	:
	:
Defendant.	:
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20-CV-11126 (JPC)(KHP)

AMENDMENT TO STIPULATED PROTECTIVE ORDER

WHEREAS, the parties to this action entered into a Stipulated Protective Order entered by the Court on February 4, 2021, Dkt. 25, in order to safeguard information and documents that are treated as confidential by the parties; and

WHEREAS, the parties mutually desire to amend the Stipulated Protective Order to limit further the use, access to, and disclosure of materials containing, disclosing or revealing: (i) the names of their respective customers or potential customers and the personnel at such customers or potential customers with which each party interacts; and (ii) any materials that would otherwise enable a party to discover the names of an adverse party's respective customers and potential customers, and the personnel at such customers or potential customers with which such adverse party interacts (collectively, "Customer Information"), by allowing each party to designate documents or other materials containing Customer Information as ATTORNEYS' EYES ONLY and thereby subject to the restrictions set forth in paragraph 2 below,

1. "Customer Information," whether it be a document, information contained in a document, information revealed during a deposition, information revealed in an interrogatory answer, or otherwise, shall be treated as "Protected Information" within the meaning of the Stipulated Protective Order and shall be subject to all of the restrictions, limitations and

provisions governing Protected Information, as well as the additional restrictions specified herein, provided such Customer Information is designated as ATTORNEYS' EYES ONLY at the time of production. In designating information as ATTORNEYS' EYES ONLY, a party will make such designation only as to information that it in good faith believes contains Customer Information.

2. Any Customer Information designated ATTORNEYS' EYES ONLY may only be disclosed to:

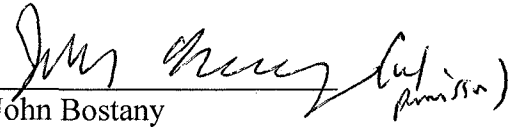
- a. Outside counsel for the parties, including, but not limited to, lawyers and support staff as reasonably necessary for the prosecution of the case;
- b. Non-party experts or other litigation support personnel who are expressly engaged by Outside Counsel of Record, or the parties to provide expert testimony or to assist in discovery and/or preparation for trial, with disclosure only to the extent necessary to perform such work, and provided such persons have agreed in writing to abide and be bound by the terms of the Stipulated Protective Order by executing the undertaking attached thereto as Exhibit 1;
- d. Any other person as to whom the Designating Party consents in writing;
- e. The Court and Court reporters employed in connection with this action, including, outside stenographic court reporters, videographic court reporters, and language translators (including support staff as reasonably necessary); and
- f. Employees of an independent commercial service providing copying, coding, digitizing and/or trial support services at the direction of Outside Counsel of Record, and provided such persons have agreed in writing to abide and be bound by the terms of the Stipulated Protective Order by executing the undertaking attached thereto as Exhibit 1.

3. All other provisions of the Stipulated Protective Order shall remain in full force and effect. All definitions contained in the Stipulated Protective Order will have the same meaning when used herein.


Dated: March 19, 2021

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SO ORDERED.

Date: March 22, 2021
New York, New York



JOHN P. CRONAN
United States District Judge

SO ORDERED:

U.S.D.J.

IT IS SO ORDERED this ___ day of _____, 2021.

HON. JOHN P. CRONAN
United States District Judge